

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

<b>IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS</b>	<b>Civ. No. 19-md-2875</b>
<b>THIS DOCUMENT RELATES TO ALL CASES</b>	

**AMENDED NOTICE TO TAKE VIDEOTAPED ORAL DEPOSITION OF  
TEVA WITNESS GANESH BUGDE**

TO: **Lori G. Cohen, Esq.,  
GREENBERG TRAURIG, LLP  
Terminus 200, 3333 Piedmont Road NE, Suite 2500  
Atlanta, GA 30305**

*Attorneys for Defendants Teva Pharmaceuticals USA, Inc., Teva Pharmaceutical Industries, Ltd., Actavis, LLC, Arrow Pharm Malta Ltd., and Actavis Pharma (hereinafter “Defendants”).*

Please take notice that pursuant to Federal Rule of Civil Procedure 30, and other applicable Rules, including the Local Civil Rules, and the applicable Orders of the Court, Plaintiffs, by and through their counsel, will take the videotaped deposition of **Ganesh Bugde** on September 26, 2024, at 10:00 PM Eastern Daylight Time (September 27, 2024, at 7:30 AM India Standard Time), via remote deposition while the witness is at 504/A, Chandroday, Aditya-vishwa Complex, Katrap, Badlapur-East, Maharashtra, India, in accordance with the Fact Witness Deposition

Protocol, Case Management Order #20, filed November 17, 2020 (Document 632).

Please be advised that this Amended Notice shall supersede and replace the Notice to Take Videotaped Oral Deposition of Teva Witness Ganesh Bugde filed September 5, 2024 (Document 2828). The witness shall produce the documents requested at Exhibit A, attached hereto, at least 5 days in advance of the deposition.

Pursuant to the meet and confer between the parties, a translator will not be provided.

**TAKING ATTORNEY FOR PLAINTIFFS:**

Taylor M. Bacques, Esq.  
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The videotaped deposition will be taken before a person authorized by law to administer oaths, pursuant to Rule 28 of the Federal Rules of Civil Procedure.

Dated: September 10, 2024

**FOR PLAINTIFFS**

By: /s/ Taylor M. Bacques  
Taylor M. Bacques  
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**EXHIBIT A**

**DOCUMENT REQUESTS**

1. The most recent resume/Curriculum Vitae and LinkedIn profile for the deponent.
2. The complete production of the deponent's relevant custodial documents, including those maintained on personal computers or electronic devices, to the extent not produced prior.

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**CERTIFICATE OF SERVICE**

I hereby certify that on September 10, 2024, I caused the foregoing document to be electronically filed with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

**FOR PLAINTIFFS**

By: /s/ Taylor M. Bacques  
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